

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Aaron Abadi,

Plaintiff,

vs.

American Airlines Group, Inc., *et al.*,

Defendant.

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**DECLARATION OF SAMER
MAJALI IN SUPPORT OF ALIA –
THE ROYAL JORDANIAN
AIRLINES PLC’S MOTION TO
DISMISS**

Civil Action No. 1:23-cv-04033-LJL

I, Samer AbdelSalam Majali, hereby declare and state as follows:

1. I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration.

2. I am the Vice Chairman/ Board Designee – CEO of Alia - The Royal Jordanian Airlines Plc (“Royal Jordanian”) with a business address of Abdoun, 5th Circle, Mohammad Ali Janah Street, building No. 37, PO Box 302 Amman 111118 Jordan, and have been employed in this position since 30/03/2021.

3. As Vice Chairman/ Board Designee – CEO, I am fully familiar with Royal Jordanian’s corporate structure as well as records, databases, standard practices regarding the ticketing of passengers transported by Royal Jordanian and the Royal Jordanian Customer Relations Team.

4. I submit this Declaration in support of the Royal Jordanian Motion to Dismiss.

5. I am fully familiar with the facts and allegations contained in Plaintiff’s Complaint and Supplemental Complaint and submit this Declaration based upon my personal knowledge except where I have stated facts to be based upon information and belief, my review of the records

of Royal Jordanian that are created and maintained in the regular course of its business and the Complaint and Supplemental Complaint filed by Plaintiff in this action.

6. As to facts based upon information and belief, I believe them to be true based upon information given to me by employees of Royal Jordanian, or through documents which I have reviewed in the course of my duties.

7. Royal Jordanian is a Hashemite Kingdom of Jordan air carrier and engaged in the business of the carriage by air of passengers, baggage and cargo.

8. Royal Jordanian is a corporation organized and existing under the laws of Jordan.

9. Royal Jordanian maintains its headquarters and principal place of business in Jordan.

10. Royal Jordanian has never maintained a principal place of business in any state in the United States, including New York or Texas.

11. On November 3, 2021, a Customer Relations Team employee responded to an e-mail from Aaron Abadi advising him of the Royal Jordanian mask mandate. A copy of the e-mail is attached to Plaintiff's Complaint at Exhibit 51.

12. At all times relevant to the Complaint and Supplemental Complaint, the Royal Jordanian Customer Relations Team was, and currently is, located in Amman, Jordan.

13. The Customer Relations Team in Amman, Jordan reviewed and handled Aaron Abadi's concerns as set forth in the emails attached as Exhibit 51 to the Complaint.

14. In October 2021, as required by U.S. federal law, Royal Jordanian imposed a mask mandate for travel on flights to and from the United States.


15. At the time of the signing of this Declaration, Royal Jordanian no longer has a mask mandate for travel on any Royal Jordanian flight.

16. According to Royal Jordanian records, Aaron Abadi did not:

- enter into or purchase a contract of carriage on Royal Jordanian between October 2021 and the present; and
- did not travel on any Royal Jordanian flight between October 2021 and the present.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on 17th January 2024

DocuSigned by:

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Samer AbdelSalam Majali